

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

ALEXANDER E. JONES

Debtor.

)
) Chapter 11
)
) Case No. 22-33553 (CML)
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)
)

**STIPULATION AND AGREED ORDER GRANTING THE OFFICIAL COMMITTEE OF
UNSECURED CREDITORS OF ALEXANDER E. JONES AN EXTENSION OF TIME
TO OBJECT TO A CLAIM OF EXEMPTIONS AND OTHER RELATED RELIEF**

Alexander E. Jones (“Jones” or the “Debtor”) and the Official Committee of Unsecured Creditors (the “Committee”) appointed in the above-captioned chapter 11 case (the “Chapter 11 Case”), by and through their respective undersigned counsel, hereby enter into this stipulation and agreed order (the “Stipulation and Order”) as follows:

WHEREAS, the Debtor filed his Schedules of Assets and Liabilities on February 14, 2023 [ECF No. 161] (the “First Schedules”);

WHEREAS, the Debtor filed his amended Schedules of Assets and Liabilities on March 30, 2023 [ECF No. 231] (the “Amended Schedules”);

WHEREAS, the Debtor filed his second amended Schedules of Assets and Liabilities on April 18, 2023 [ECF No. 242] (the “Second Amended Schedules” and together with the First Schedules and the Amended Schedules, the “Schedules”);

WHEREAS, the Debtor has identified at least one additional modification to be made to the Schedule C of the Second Amended Schedules, and has informed the Committee that it may file further amended Schedules in the future;

WHEREAS, the deadline for a party to challenge a designation of any purportedly exempt property listed on the Schedule C of the Second Amended Schedules is currently set to expire on May 18, 2023, and such deadline will be extended if and when future amended Schedules are filed;

WHEREAS, in order to preserve resources of the estate, counsel for the Committee and counsel for the Debtor have agreed to extend the deadline for any challenge to Schedule C of the Second Amended Schedules to until and at least June 19, 2023, and as may be further extended by written agreement between the parties, operation of the applicable rules, or order of the Court;

WHEREAS, good cause exists to extend the deadline to object to the designation of any property currently designated as exempt on Schedule C of the Second Amended Schedules;

NOW, THEREFORE IN CONSIDERATION OF THE FOREGOING RECITALS, IT HEREBY IS STIPULATED AND AGREED as follows:

1. The deadline for the Committee to object to the Debtor's list of property claimed as exempt in the Debtor's Schedule C of the Second Amended Schedules shall be extended to June 19, 2023.

2. The undersigned hereby represent and warrant that they have full authority to execute this Stipulation on behalf of the respective parties, and that the respective parties have full knowledge of, and have consented to, this Stipulation.

3. This Stipulation shall be effective immediately upon filing with the Court.

4. The Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Stipulation, and the parties hereby consent to such jurisdiction to resolve any disputes or controversies arising from or related to this Stipulation.

STIPULATED AND AGREED TO THIS 17TH DAY OF MAY 2023

By: /s/ Vickie L. Driver

Vickie L. Driver

CROWE & DUNLEVY, P.C.

Vickie L. Driver

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By: /s/ Marty L. Brimmage, Jr.

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*Counsel to the Official Committee of Unsecured
Creditors of Alexander E. Jones*

SO ORDERED:

Dated: _____, 2023

THE HONORABLE CHRISTOPHER M. LOPEZ
UNITED STATES BANKRUPTCY JUDGE